



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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February 28, 2020

Lesli Holcomb, Risk Control Manager  
SuperValu  
1525 East D Street  
Tacoma, WA 98421-1609

Re: NPDES Permit Number WAR001693

Dear Lesli Holcomb:

Enclosed is the report from the Department of Ecology's recent Industrial Stormwater National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater General Permit (ISGP) compliance inspection, conducted at your facility on January 22, 2020. Thank you for the time your personnel spent with me during my visit.

Please contact me at [honor.carpenter@ecy.wa.gov](mailto:honor.carpenter@ecy.wa.gov) or (360) 407-6273 if you have any questions, comments, or would like additional technical assistance.

Sincerely,

A handwritten signature in blue ink, reading "Honor Carpenter", with a long, sweeping horizontal line extending to the right.

Honor Carpenter  
Industrial Stormwater Facility Manager  
Southwest Regional Office  
Water Quality Program

Enclosure: Industrial Stormwater Inspection Report

cc: Kendra Henderson, Ecology





## Water Compliance Inspection Report

### Section A: National Data System Coding (i.e., PCS)

|                      |       |  |                 |           |               |          |    |    |    |    |
|----------------------|-------|--|-----------------|-----------|---------------|----------|----|----|----|----|
| Transaction Cod      | NPDES | yr/mo/dy                                   | Inspection Type | Inspector | Facility Type |          |    |    |    |    |
| 1   N                | 5     | WAR   001   693                            | 2020   01   22  | 0   C     | S             | 2        |    |    |    |    |
| Remarks              |       |  |                 |           |               |          |    |    |    |    |
| 21                   |       |  |                 |           |               |          |    |    |    | 66 |
| Inspection Work Days |       | Facility Self-Monitoring Evaluation Rating |                 | B1        | QA            | Reserved |    |    |    |    |
| 67                   |       | 69   |                 | 70        | 71            | 72       | 73 | 74 | 75 | 80 |

### Section B: Facility Data

|  |   |   |
|--|---|---|
| Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)   | Entry Time/Date<br>11:15 hours<br>1/22/2020   | Permit Effective Date<br>January 1, 2020    |
| SuperValu Distribution Center Main<br>1525 E D St<br>Tacoma, WA 98421  | Exit Time/Date<br>13:20 hours<br>1/22/2020  | Permit Expiration Date<br>December 31, 2024 |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Email<br>Taylor Rodriguez,<br>Phone: (206) 251-2960<br>Email: RubenT.Rodriguez@unfi.com  | Other Facility Data (e.g., SIC NAICS, and other description information)<br>This facility is an 11.8-acre grocery distribution facility.  |   |
| Name, Address of Responsible Official/Title/Phone and Email<br>Lesli Holcomb, Risk Control Manager<br>SuperValu<br>1525 E D St<br>Tacoma, WA 98421-1609<br>Phone: (253)404-4123<br>Email: lesli.holcomb@unfi.com | Standard Industry Code (SIC): 2099, Food Preparations, NEC; 4222, Refrigerated Warehousing and Storage; 5141, Groceries, General Line.<br><br>North American Industry Classification System (NAICS): 311999, All Other Miscellaneous Food Manufacturing; 493120, Refrigerated Warehousing and Storage; 424410, General Line Merchant Warehouse Wholesalers. |   |
| Contacted<br><input type="checkbox"/> No <input checked="" type="checkbox"/> Yes   |   |   |

### Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

|  |  |  |                              |
|--|--|--|------------------------------|
| <input checked="" type="checkbox"/> Permit               | <input checked="" type="checkbox"/> Self-Monitoring Program  | <input type="checkbox"/> Pretreatment                    | <input type="checkbox"/> MS4 |
| <input checked="" type="checkbox"/> Records/Reports      | <input type="checkbox"/> Compliance Schedules                | <input checked="" type="checkbox"/> Pollution Prevention |                              |
| <input checked="" type="checkbox"/> Facility Site Review | <input type="checkbox"/> Laboratory                          | <input checked="" type="checkbox"/> Stormwater           |                              |
| <input type="checkbox"/> Effluent/Receiving Waters       | <input checked="" type="checkbox"/> Operations & Maintenance | <input type="checkbox"/> Combined Sewer Overflow         |                              |
| <input type="checkbox"/> Flow Measurement                | <input type="checkbox"/> Sludge Handling/Disposal            | <input type="checkbox"/> Sanitary Sewer Overflow         |                              |

### Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

WAR001693 authorizes SuperValu Distribution Center Main (SuperValu) to discharge stormwater associated with industrial activity and conditionally-approved non-stormwater to surface waters of the State of Washington (State) or storm systems that drain to waters of the State.

Upon arrival at the facility for an unannounced inspection, I had difficulty locating personnel. A door at the north side of the front of the building led to a vacant room with a phone and a number directory on the wall. I tried to reach the contact listed in Ecology's Permitting and Reporting Information System (PARIS) database on my cellular phone, but I got voicemails. I left a message or two and tried to navigate reaching one of the contacts listed on the sheet on the wall. I failed to reach someone. During this time, people assumed to be SuperValu employees were entering and leaving via various doors off the reception room. The doors turned out to be locked and people seemed to be occupied with their own tasks. A woman I approached agreed to try to find someone for me who might know something about their Industrial Stormwater General Permit (ISGP). After approximately forty minutes, Taylor Rodriguez appeared and introduced himself. He said he was a SuperValu/ UNFI employee and SuperValu was recently purchased by UNFI the three large facilities in Tacoma were in the process of being shuttered because the operation was moving to Lewis county, Washington. Taylor Rodriguez stated that he normally worked in fleet management and logistics but was trying to keep the sites in compliance with their respective ISGPs while the move was completed. Taylor Rodriguez stated he was working at both the Lewis county and Pierce county facilities at the same time. I explained to Taylor Rodriguez that I was there to conduct an unannounced National Pollutant Discharge Elimination System (NPDES) ISGP compliance inspection that would involve a file review and a walk around the outside of the facility. Taylor Rodriguez agreed get the paperwork and left for a few minutes and returned with a binder containing the site paperwork. I reviewed paperwork first, then we walked the site while discussing the project.

Taylor Rodriguez said that the operation had almost fully moved to Lewis county but continues to receive truckloads of freight daily. He said that



instead of stripping and reloading trailers at the site, full trailers were being staged at 1525 E D Street and then hauled to Lewis county as needed.

S3. – Stormwater Pollution Prevention Plan (SWPPP) – The SWPPP was available for review and was last revised by Nisqually Environmental on July 15, 2019. The SWPPP was signed and certified in accordance with S3.A.5 and G2.

S4. – General Sampling Requirements – There is one monitoring location, identified on site paperwork as SV1. Taylor Rodriguez was not certain exactly where samples were taken. According to a City of Tacoma map of SuperValu, an oil/water separator treats industrial stormwater collected from the east and north sides of the facility before SuperValu's stormwater enters the City of Tacoma's storm system at the west side of the site. The storm line crosses D Street and exits through an outfall identified as "249". The outfall discharges to the Thea Foss Waterway. SuperValu monitored the correct parameters, which remain unchanged in the 2020 ISGP. Spectra Laboratories conducted analysis of compliance samples.

S5. – Benchmarks, Effluent Limits and Specific Sampling Requirements- SuperValu correctly monitored the S5. Table 2 parameters that all permittees must monitor- total copper; total zinc; turbidity; pH and oil sheen. Additional sector specific monitoring requirements for those in the Chemical and Allied Products and Food and Kindred Products sector identified in S5. Table 3, biological oxygen demand (BOD5), nitrogen an N and total phosphorous (P) apply to this site and were monitored accordingly.

S6.- Discharges to Impaired Waters-

The receiving water for this facility is the Thea Foss Waterway. The segment of the Thea Foss Waterway that receives SuperValu's discharge is listed as Category 4B for sediment, with over 35 impairments. It is a Puget Sound Sediment Cleanup Site.

S6. Table 7 requires quarterly total suspended solids (TSS) monitoring because SuperValu's discharge enters a 303(d) listed waterbody that is Category 4B (rather than Category 5) for sediment, and includes a benchmark value rather than an effluent limit (S6.C.2.c).

SuperValu removed accumulated solids (S6.C.2.d) and sampled sediments in their stormwater conveyance system in April 2016 (S6.C.2.e) and submitted results to Department of Ecology (S6.C.2.f).

A water quality improvement project, Puget Sound Nutrient Source Reduction project, is in development for the receiving waters.

S7. – Monthly Inspections – Completed inspection reports were available and retained with the SWPPP.

S8. – Corrective Actions – Corrective Actions were not triggered for this facility during the life of the 2015 ISGP.

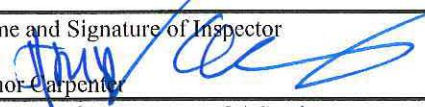

S9. – Reporting and Recordkeeping – The paperwork required by S9 was available for review. I looked at DMRs (S9.B); Annual Reports (S9.C); ISGP; ISGP coverage letter and miscellaneous documents (S9.D).

After walking the site, we had a brief closing discussion during which I told Taylor Rodriguez that I did not note defects during my inspection and thanked him for his time.

REQUIREMENTS:

Follow the terms and conditions of the ISGP.

- ☐ Announced  
☒ Unannounced

|  |                             |           |
|--|-----------------------------|-----------|
| Name and Signature of Inspector  | Agency/ Office Number       | Date:     |
| Honor Carpenter         | Ecology/SWRO (360) 407-6273 | 2/18/2020 |
| Signature of Management QA Reviewer  | Agency/ Office Number       | Date:     |
| Steven G. Eberl, P. E.  | Ecology/SWRO (360) 407-6293 | 3-2-2020  |

EPA FORM 3560-3 (Rev 1-06) Previous editions are obsolete



### Image Log

Image 1 of 7: Long-view of yard, facing southwest.



Image 2 of 7: Main drain valve allows operator to direct flow to the stormwater system. An oil-water treats stormwater at the fuel island.



Image 3 of 7: Scrap dumpster with lid closed.



Image 4 of 7: Storm lines flow to outfall # 249, which discharges to the Thea Foss Waterway.



Image 5 of 7: Fueling island.



Image 6 of 7: Multiple spill kits were cached outside the dispatch center.



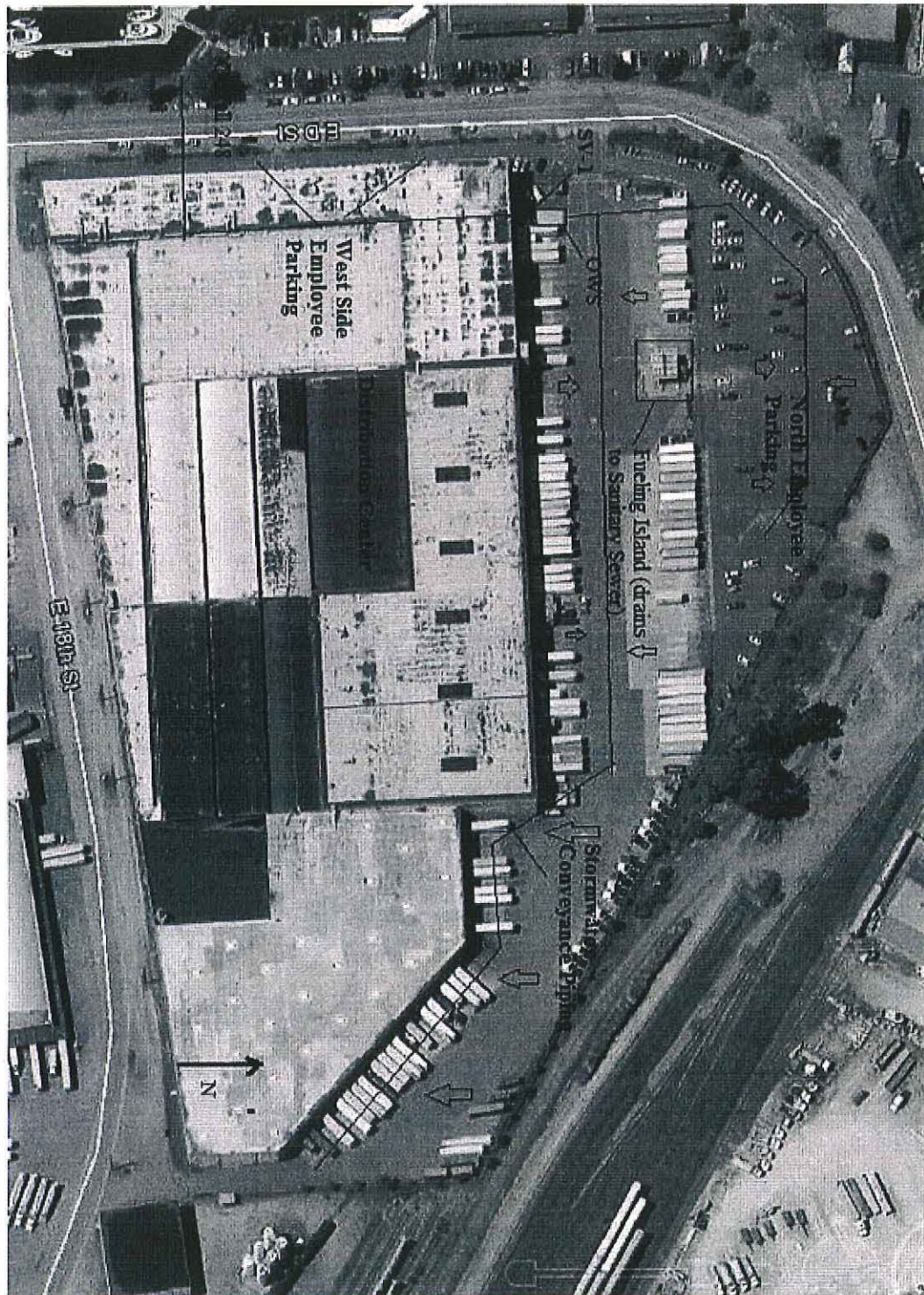


Permit #WAR001693  
January 22, 2020

Inspector: Honor Carpenter  
Photographer: Honor Carpenter  
Camera: iPhone 7

## Image Log

Image 7: Site Map.



Appendix B Site Map

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11th Ave